

## EXHIBIT 6

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself  
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**AFFIDAVIT OF JAN KOSTYUN**

I, Jan Kostyun, do hereby state as follows:

1. I am over the age of 18, of sound mind, and competent to testify as set forth herein.
2. I make this Affidavit in support of QuoteWizard's Opposition to the Motion for Class Certification in the above-captioned case.
3. Counsel for QuoteWizard engaged me as an expert witness in this matter for the primary purpose of analyzing Plaintiff Joseph Mantha's ("Plaintiff's") proposed class membership and to determine whether class membership or liability could be determined under the facts of this case in a class-wide manner.
4. I also authored an expert rebuttal report in this case, rebutting the assertions of Plaintiff's proposed expert in this case, Anya Verkhovskaya.
5. Ms. Verkhovskaya produced an "Amended and Corrected Supplemental Report" on December 8, 2023, which was after the November 24, 2023 deadline to submit rebuttal expert reports in this case. It was in this untimely report that Ms. Verkhovskaya first produced the current

version of her “Class List.” Due to the lateness of her submission, I did not have an opportunity to respond to her final list during the period allotted for expert discovery in this case.

6. I am an independent technology consultant with over 35 years of experience covering the areas of telecommunications, enterprise architecture, and information technologies.

7. I also have extensive experience in database methodologies, data analysis, and data mining.

8. I have personal knowledge of the matters set forth in this Affidavit based on my review and analysis of the records produced in discovery in this matter, as I have personally reviewed those records and used them to draft my expert reports in this matter.

9. The matters set forth in this Affidavit are true and accurate to the best of my knowledge and understanding.

10. Based on the records that I reviewed and which were produced in discovery in this case, QuoteWizard produced at least one record of consent to be contacted associated with 67,425 members – or more than 99.75% - of Plaintiff’s proposed class.

11. Based on the records that I reviewed and which were produced in discovery in this case, QuoteWizard produced Active Prospect Trusted Form Certificates associated with 12,579 members of Plaintiff’s proposed class.

12. Based on the records that I reviewed and which were produced in discovery in this case, QuoteWizard produced Jornaya LeadIDs associated with 60,560 members of Plaintiff’s proposed class.

13. Based on the records that I reviewed and which were produced in discovery in this case, the source of the lead information associated with Mr. Mantha – RevPoint Media, LLC

(“RevPoint”) - is the same for just 16 other members of Plaintiff’s proposed class. QuoteWizard produced records of consent to be contacted for all 17 of these leads.

14. QUOTEWIZARD000948<sup>1</sup>, a record produced by QuoteWizard in discovery, contains evidence of several consumers’ consent to be contacted. Based on my review of this record, it is my determination that some of the Leads sold to QuoteWizard by Inquir originated on the following website: <https://coverage.localmedicarepro.com/>.

15. QUOTEWIZARD001800<sup>2</sup>, a record produced by QuoteWizard in discovery, contains evidence of several consumers’ consent to be contacted. Based on my review of this record, it is my determination that some of the Leads sold to QuoteWizard by Union Square Media originated on the following websites: (i) <https://ottoinsurance.com>, (ii) <https://auto-savings.com>, (iii) <https://easyautosavings.com>, (iv) <https://thegiraffe.com>, and (v) <https://carsavings.io>.

16. QUOTEWIZARD002076<sup>3</sup>, a record produced by QuoteWizard in discovery, contains evidence of several consumers’ consent to be contacted. Based on my review of this record, it is my determination that some of the Leads sold to QuoteWizard by Lead Gate Media originated on the following websites: (i) <https://insuranceoffersnow.com/>, (ii) <https://www.insure.com/>, (iii) <https://autosavertoday.com>, (iv) <https://autosaveforme.com>, and (v) <http://www.1minutequotes.com>.

17. QUOTEWIZARD002103<sup>4</sup>, a record produced by QuoteWizard in discovery, contains evidence of several consumers’ consent to be contacted. Based on my review of this record, it is my determination that some of the Leads sold to QuoteWizard by Media Alpha

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<sup>1</sup> The file name associated with this Bates number is: “INQUIR\_INBOUND\_PAGE DETAILS.csv”

<sup>2</sup> The file name associated with this Bates number is: “UNIONSQUAREMEDIA\_INBOUND\_PAGE DETAILS.csv”

<sup>3</sup> The file name associated with this Bates number is: “LEADGATEMEDIA\_INBOUND\_PAGE DETAILS.csv”

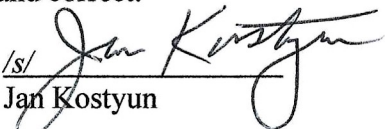
<sup>4</sup> The file name associated with this Bates number is: “MEDIAALPHA\_INBOUND\_PAGE DETAILS.zip”

originated on the following websites: (i) <https://www.healthplans.com>, (ii) <https://www.directhealthinsurance.com>, (iii) <https://www.healthplans.org>, (iv) <https://www.directhealthinsurance.com>, and (v) <https://coverageprofessor.com>.

18. QUOTEWIZARD002124<sup>5</sup>, a record produced by QuoteWizard in discovery, contains evidence of several consumers' consent to be contacted. Based on my review of this record, it is my determination that some of the Leads sold to QuoteWizard by New Level Media originated on the following websites: (i) <https://www.dailyinsurancedeals.com/home-insurance>, (ii) <https://www.dailyinsurancedeals.com/health-insurance>, and (iii) <https://www.dailyinsurancedeals.com/auto-insurance-quotes>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 9<sup>TH</sup> day of February, 2024.

/s/   
Jan Kostyun

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<sup>5</sup> The file name associated with this Bates number is: "NEWLEVELMEDIA\_INBOUND\_PAGE DETAILS.csv"